

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---------------|---|-----------------------|
| IN RE: | : | |
| Dionicio Mena | : | Chapter 13 |
| | : | Case No. 22-10135-PMM |
| Debtor(s) | : | |

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY WILMINGTON SAVINGS FUND SOCIETY

Debtor, Dionicio Mena, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Wilmington Savings Fund Society, hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted missed. Debtor asks for the chance to cure.
7. Debtor opposes the same.
8. Admitted missed. Debtor asks for the chance to cure.
9. Denied. Debtor asks for the chance to cure.
10. No response required.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: June 1, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Scott F. Waterman, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Rebecca A. Solarz, Esq.
Attorney for Movant *Wilmington Savings Fund Society*
Electronic Notice to *bkgroup@kmlawgroup.com*

Dated: June 1, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
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